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Attorney for Defendant
ARNES KRAJINIC

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,
v.

ARNES KRAJINIC,

Defendant.

Case No.: 2:23-CR-00074-DJC

STIPULATION REGARDING
EXCLUDABLE TIME PERIODS
UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: June 13, 2024

TIME: 9:00 a.m.

COURT: Hon. Daniel J. Calabretta

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and
defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on June 13, 2024.
2. By this stipulation, the parties move to continue the status conference until July 11, 2024, at 9:00 a.m., and to exclude time through July 11, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes search warrants, photographs, audio recordings, and video recordings. This discovery has been either produced directly to counsel and/or made available for inspection and copying.

STIPULATION REGARDING EXCLUDABLE TIME
PERIODS UNDER SPEEDY TRIAL ACT

1 b) Counsel for defendant desires additional time to consult with his client
2 regarding discovery and otherwise prepare for trial. Counsel is currently in jury trial in
3 Placer County and cannot be present on June 13, 2024. Counsel for defendant was also
4 delayed consulting with his client due to recently having to have surgery on April 21,
5 2024. A continuance is necessary for continuity of counsel.

6 c) Counsel for defendant believes that failure to grant the above-requested
7 continuance would deny him the reasonable time necessary for effective preparation,
8 taking into account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing the
11 case as requested outweigh the interest of the public and the defendant in a trial within
12 the original date prescribed by the Speedy Trial Act.

13 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. §
14 3161, et seq., within which trial must commence, the time period of June 13, 2024, and
15 July 11, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A),
16 B(iv) [Local Code T4] because it results from a continuance granted by the Court at
17 defendant's request on the basis of the Court's finding that the ends of justice served by
18 taking such action outweigh the best interest of the public and the defendant in a speedy
19 trial.

20 4. Nothing in this stipulation and order shall preclude a finding that other
21 provisions of the Speedy Trial Act dictate that additional time periods are excludable
22 from the period within which a trial must commence.

23 **IT IS SO STIPULATED.**

24 Dated: June 10, 2024

/s/ David D. Fischer

DAVID D. FISCHER

Attorney for Defendant

ARNES KRAJINIC

PHILLIP A. TALBERT
US ATTORNEY

Dated: June 10, 2024

/s/ Emily Sauvageau
EMILY SAUVAGEAU
Assistant United States Attorney

ORDER

IT IS SO FOUND AND ORDERED this 10th day of June, 2024.

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE